

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA GOEDINGHAUS,	§	
	§	
Plaintiffs,	§	Case No. 5:23-cv-00580-FB
	§	
v.	§	
	§	Judge: Hon. Fred Biery
TRAMMELL S. CROW, JR., DR. BENJAMIN TODD ELLER, RICHARD HUBBARD, DR.	§	Courtroom: 8509
MELISSA MILLER, DR. JOSEPH BOLIN, DR. SCOTT WOODS, DR.	§	Date Action Filed: May 8, 2023
MRUGESHKUMAR SHAH, MICHAEL CAIN, COE JURACEK, PHILIP ECOB, H.J.	§	(transferred)
COLE, TEXAS RANGER CODY	§	
MITCHELL,	§	
KURT KNEWITZ, PAUL PENDERGRASS, RALPH ROGERS, ROBERT PRUITT,	§	
SCOTT BRUNSON, CASE GROVER,	§	
RICHARD BUTLER, MARC MOLINA,	§	
MICHAEL HYNES, JR., SHAWN MAYER,	§	
JADE MAYER, RCI HOSPITALITY	§	
HOLDINGS, INC., INTEGRITY BASED	§	
MARKETING, LLC, STORM FITNESS	§	
NUTRITION, LLC, ULTRA COMBAT	§	
NUTRITION, LLC, ECOLIFT HOMES LLC,	§	
ELEVATED WELLNESS PARTNERS LLC,	§	
DOE INDIVIDUALS 1–20, and DOE	§	
COMPANIES 21–30	§	
Defendants.	§	

PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS

Plaintiffs Julia Hubbard and Kayla Goedinghaus (“Plaintiffs”) request leave to exceed the Court’s page limits and permit Plaintiffs to file an Opposition to Defendant Crow’s Motion to Dismiss that is up to twenty-seven (27) pages long.

Pursuant to Local Rule CV-7(D), parties are limited to twenty (20) pages for non-discovery motions. Plaintiffs’ Amended Complaint is 74 pages long, asserts claims against twenty-nine

named individuals (plus additional unnamed individuals and companies), and asserts four causes of action against all defendants. (*See, e.g.*, Amended Complaint, Dkt. No. 190.) This request for seven (7) additional pages is not for the purpose of delay or to complicate the proceedings but in order to ensure that the issues in dispute are clearly presented to the Court. The Court having granted Defendant Trammell S. Crow’s (“Crow”) Motion for Leave to Exceed Page Limits for his Motion to Dismiss should grant Plaintiffs’ similar Motion for Leave. The additional pages are necessary to address and respond to the claims made in the Defendant’s Motion to Dismiss. Plaintiffs have met and conferred with Defendant Crow, and he is unopposed to the relief requested.

Dated: New York, New York
August 16, 2023

Respectfully submitted,



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**Admitted Pro Hac Vice*